

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

KENNETH FLEMING, JOHN DOE, R.K., and
T.D.

NO. 04-2338 RSM

Plaintiffs.

v.

THE CORPORATION OF THE PRESIDENT
OF THE CHURCH OF JESUS CHRIST OF
LATTER-DAY SAINTS, a Utah corporation
sole, a/d/a "MORMON CHURCH"; LDS
SOCIAL SERVICES a/d/a LDS, a Utah
corporation.

Defendants.

DECLARATION OF CHARLES C.
GORDON RE: MOTION FOR
LEAVE TO TAKE DEPOSITIONS
AND CR 37(a)(2)
REPRESENTATION

Charles C. Gordon, being duly sworn on oath, deposes and says:

1. He is one of the lead counsel for the defendants in this matter.
 2. He has met and conferred with plaintiff's counsel regarding defendant's request for additional discovery both by correspondence and by telephone conference on June 29, 2006.
 3. Counsel were unable to resolve the issues presented in defendant's motion.
 4. This declaration is submitted pursuant to CR 37(a)(2).

I declare under the laws of the State of Washington and of the United States that the

foregoing is true and correct.

DECLARATION OF CHARLES C. GORDON RE: MOTION
FOR LEAVE TO TAKE DEPOSITIONS AND CR 37(a)(2)
REPRESENTATION - 1
No. 04-2338 RSM

GORDON MURRAY TILDEN LLP
1001 Fourth Avenue, Suite 4000
Seattle, WA 98154
Phone (206) 467-6477
Fax (206) 467-6292

1 DATED this 29th day of June, 2006.
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Charles C. Gordon

DECLARATION OF CHARLES C. GORDON RE: MOTION
FOR LEAVE TO TAKE DEPOSITIONS AND CR 37(a)(2)
REPRESENTATION - 2
No. 04-2338 RSM

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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following. The parties will additionally be served in the manner indicated.

Michael T. Pfau
Gordon, Thomas, Honeywell, Malanca,
Peterson & Daheim LLP
P.O. Box 1157
Tacoma, WA 98401-1157
Telephone: (206) 676-7500
Facsimile: (206) 676-7575
E-Mail: mpfau@gth-law.com

Timothy D. Kosnoff
Law Offices of Timothy D. Kosnoff, P.C.
600 University Street, Suite 2101
Seattle, WA 98101
Telephone: (206) 676-7610
Facsimile: (425) 837-9692
E-Mail: timkosnoff@comcast.net

Mail Hand Delivery
 Fax Federal Express

() Mail () Hand Delivery
() Fax () Federal Express

GORDON MURRAY TILDEN LLP

By Charles C. Gordon
Charles C. Gordon, WSBA No. 1773
Attorneys for Defendant The Corporation of the
President of the Church of Jesus Christ of
Latter-Day Saints
1001 Fourth Avenue, Suite 4000
Seattle, WA 98154-1007
Telephone: (206) 467-6477
Facsimile: (206) 467-6292
E-mail: cgordon@gmtlaw.com

DECLARATION OF CHARLES C. GORDON RE: MOTION
FOR LEAVE TO TAKE DEPOSITIONS AND CR 37(a)(2)
REPRESENTATION - 3
No. 04-2338 RSM

GORDON MURRAY TILDEN LLP
1001 Fourth Avenue, Suite 4000
Seattle, WA 98154
Phone (206) 467-6477
Fax (206) 467-6292